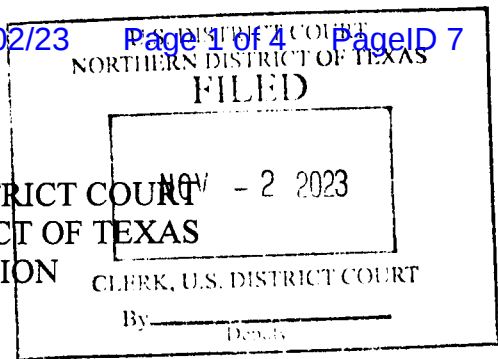


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

NO. 4:23-MJ-823

CINDY RODRIGUEZ SINGH (01)
ARSHDEEP SINGH (02)

CRIMINAL COMPLAINT

I, Pance Kecev, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about March 22, 2023, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants, **Cindy Rodriguez Singh** and **Arshdeep Singh** traveled in interstate and foreign commerce with the intent to avoid prosecution or custody for a crime, which is a felony under the laws of Texas, and from which the fugitive did flee.

In violation of 18 U.S.C. § 1073.

Introduction And Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since January 2019. I am currently assigned to the FBI Dallas Division's Fort Worth Resident Agency on a Criminal Enterprise Squad working with a Violent Crime/Gang Task Force (hereafter referred to as the Task Force). The Task Force is comprised of agents and investigators from the Fort Worth, Texas Police Department (FWPD).

2. In my current assignment, I conduct investigations into violent crime, kidnappings, and fugitive matters. As a law enforcement officer, I have conducted Title III wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations.

3. The information set forth in this affidavit is true and correct to the best of my knowledge and was obtained from records, witnesses, and other law enforcement officers, agents, or analysts. This affidavit does not set forth all of my knowledge about this investigation.

Probable Cause

4. On March 20, 2023, Everman Police Department (EPD) officers were dispatched to conduct a welfare check on behalf of a minor male, (hereafter referred to as N.A.) at the request of the Department of Family and Protective Services (DFPS) . N.A. was under the care and custody of his mother **Cindy Rodriguez Singh** (hereafter referred to as **Rodriguez Singh**). During the interview, **Rodriguez Singh** informed officers N.A. was living with his biological father in Mexico and had been there since November 2022.

5. On March 22, 2023, **Rodriguez Singh**, her husband **Arshdeep Singh** (hereafter referred to as **Singh**), and six juvenile children flew from Dallas/Fort Worth International Airport to Indira Gandhi International Airport in Delhi, India. Flight manifests and passport application queries yielded no results for N.A. All airline tickets were purchased within 24 hours of flight departure. Additionally, DFPS learned that **Rodriguez Singh** had unenrolled N.A.'s siblings from school on March 22, 2023.

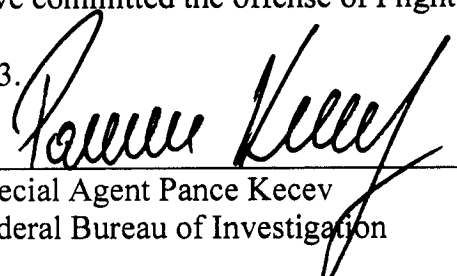
6. Texas Department of Public Safety (DPS) Texas Rangers obtained **Singh's** bank account records. According to the records, on March 22, 2023, at approximately 5:01 p.m. Central Standard Time, **Singh** made a cash deposit of \$8,000 into a Chase Bank account. The deposit was made approximately two hours prior to **Singh's** arrival at the DFW Airport. **Singh's** employer informed law enforcement that, based on their daily financial report information, on March 22, 2023, **Singh** made an unauthorized "payout" listed to "Arsh" in the amount of \$10,000.

7. On March 23, 2023, CPS contacted N.A.'s biological father in Mexico. N.A.'s father denied acquiring custody of N.A., stating he was deported from the United States to Mexico before N.A. was born and that he had never seen N.A. in person.

8. Following additional investigative steps conducted by EPD, with the assistance of other state and federal law enforcement agencies, on March 31, 2023, State of Texas, Tarrant County arrest warrants were issued for **Rodriguez Singh** and **Singh** for violations of Texas Penal Code 22.041(B), Abandonment/Endangerment of a Child, warrant numbers PC55661 (**Rodriguez Singh**) and PC55662 (**Singh**).

9. Additionally, on or about October 31, 2023, a State of Texas, Tarrant County arrest warrant was issued for **Rodriguez Singh** for a violation of Penal Code 19.03(a)(8), Capital Murder of a person under ten years old.

10. Based upon the aforementioned facts, I have probable cause to believe that **Cindy Rodriguez Singh** and **Arshdeep Singh** have committed the offense of Flight to Avoid Prosecution in violation of 18 U.S.C. § 1073.


Special Agent Pance Kecev
Federal Bureau of Investigation

Sworn and subscribed to me this 20 day of November 2023 at 2:12 p.m in Fort Worth, Texas.


HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE